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6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA  
8

9 ADAM HERSHMAN, on behalf of himself  
and all others similarly situated, *et al.*

10 Plaintiffs,

11 vs.

12 FULL SPECTRUM LASER LLC,

13 Defendant.

Case No. 2:21-cv-2245-CDS-BNW

**Response to Order to Show Cause**

14 Come now Adam Hershman and Sumit Singh, individually and on behalf of the collective  
15 of plaintiffs herein (collectively, the “Plaintiffs”), in response to this Honorable Court’s Order to  
16 Show Cause Why a Proposed Joint Pretrial Order is Not Filed, DE #31, and state as follows:

17 As reported in a notice filed earlier this week, the parties to this litigation have reached a  
18 settlement of all claims. *See* Notice of Settlement, DE #32. The resolution is the byproduct of  
19 negotiations that have spanned a healthy period of time (albeit no doubt intermittently) and is one  
20 that is palatable to each of the Plaintiffs and Full Spectrum Laser LLC (the “Defendant”). The  
21 parties are currently working to finalize the subject agreement and, per the aforesaid notice,  
22 anticipate that the instant litigation will be dismissed, with prejudice, not later than August 20,  
23 2025 (being thirty days from the date on which the settlement notice was filed).

1 In light of the foregoing, the Plaintiffs respectfully ask this case be held in abeyance,  
2 pending entry of a notice of dismissal with prejudice. Doing so will promote judicial and  
3 economic efficiencies, will promote the interests of the parties, and will allow for the streamlined  
4 conclusion of a case that—as this Honorable Court properly notes in the order to show cause—  
5 has pended for a healthy modicum of time.

6 The foregoing notwithstanding, should this Honorable Court not believe it proper to hold  
7 this case in abeyance pending entry of a stipulation of dismissal with prejudice, the Plaintiffs are  
8 prepared to docket a pre-trial order. Such has *not* been negotiated with the Defendant, as of  
9 present, since this case ceased to be contested when settlement terms were agreed upon in  
10 principle. And the Plaintiffs would not object to any motion of the Defendant to once-more extend  
11 the subject deadline for a modest period of time, insofar as the parties' agreement did cause a  
12 cessation of discovery activities (as settlements are wont to do). The Plaintiffs, however, would  
13 be certainly amenable to docketing a pretrial order while the settlement is finalized, if this  
14 Honorable Court believes such appropriate, and have all of the information they would need to  
15 complete such a filing, without the need for any further discovery or external inquiries.

16 WHEREFORE, the Plaintiffs respectfully pray this Honorable Court (i) discharge the  
17 show cause order; (ii) hold this case in abeyance to and through August 20, 2025; and (iii) afford  
18 such other and further relief as may be just and proper.

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1 Dated: July 24, 2025

Respectfully submitted,

2 /s/ Maurice B. VerStandig  
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7  
8 **CERTIFICATE OF SERVICE**

9 I HEREBY CERTIFY THAT on this 24th day of July, 2023, I served the foregoing  
10 document upon counsel for the Defendant, listed below, via this Honorable Court's CM/ECF  
11 system:

12 Kenneth Hogan, Esq.  
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18  
19 /s/ Maurice B. VerStandig  
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